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November 18, 2020

The Honorable Carol Bagley Amon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Joseph Bosco
Docket No. 0207 1:19CR00443-003(CBA)

*The government
is directed to advise
the Court on its position
on this application within
10 days of
11/23/20*

Your Honor:

[Signature]
/s/ Carol Bagley Amon

This letter is respectfully submitted on behalf of Joseph Bosco for reconsideration of his sentence under the present circumstances. On September 22, 2020, Joseph Bosco appeared before Your Honor, with his co-defendants, for sentencing. The sentence imposed was a four-month term of imprisonment. Joseph Bosco takes full responsibility for his actions and accepts he has to be incarcerated. However, it has come to our attention that if he is incarcerated for a term of four months, he will inevitably lose his job in the corporate environment, that he has arduously worked and continued to excel in for the last 36 years. 11/23/20

Your sentence was quite clear at the time of sentencing, but after going over his company's options for a personal leave of absence, vacation days, sick time, etc., he simply cannot make it work for four months. The most he can take is 90 days. After that, if he is not at work on the 91st day, his employment will be terminated. He respectfully requests his sentence be reduced to 90 days imprisonment and 30 days home confinement.

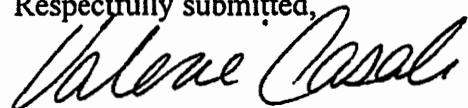
As our final plea, we ask Your Honor to consider showing Joseph Bosco and his family compassion for the current circumstances and to help him maintain the productive life he has built for himself and his family. If he were to lose his job, he would be unable to support his family, as his income is the family's stability. During these unprecedented times of COVID-19, it is challenging for many people to maintain their job, let alone obtain a new form of employment. If we add the current climate of the world we live in today, with having a felony conviction, it is unlikely Joseph Bosco will be able to secure another form of employment, especially one where he is able to make ends meet. The real serious dangers include losing their home and being unable to finance his wife's medical bills with all of her conditions. As Your

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Murray Richman

Honor is aware from our sentencing memorandum, Joseph Bosco's wife Lynn, is a cancer survivor and suffers from valvular heart disease, autosomal dominant polycystic kidney disease and stage three chronic kidney disease. Furthermore, Joseph's Bosco's mother-in-law is elderly and depends on Joseph for her daily activities.

We are asking Your Honor to please consider a lesser term of imprisonment and impose the difference with home confinement. We would not be making this application unless it was absolutely necessary to avoid very serious consequences for not only Joseph Bosco, but also his wife, mother, mother-in-law as well as other members of his family. I submit to Your Honor, a term of imprisonment of 90 days followed by 30 days home confinement is sufficient for the purposes of punishment. If he is incarcerated for four months, his life and the life of his family will be devastated. To allow him to maintain his employment, will further allow him to be a productive member of society. Thank you very much for your time and consideration.

Respectfully submitted,



Valerie Casali, Esq., *of counsel*
Murray Richman, Esq.

Cc: Honorable Carol Bagley Amon
AUSA Megan E. Farrell
AUSA Elizabeth Geddes
US Probation Officer Jaime L. Turton
Joseph Bosco